

26523 200th Street
Belle Plaine, MN 56011-9302
February 24, 2004

Conservation Security Program Comments
ATTN: David McKay
NRCS Conservation Operations Division
P.O. Box 2890
Washington, DC 20013

Dear Mr. McKay:

Here are my suggestions for important changes to the USDA's proposed rules for the operation of the Conservation Security Program (CSP). I support the intent of Congress—that CSP be open to ALL farmers in the US practicing effective conservation on working farmlands.

1. Fix problems with the proposed rules issued on January 2, 2004. USDA should issue a supplement to the rule which would be open for public comment. The proposed rules are not consistent with the law authorizing the CSP nor with the funding allocated by Congress making CSP an uncapped national entitlement program.
2. The USDA's preferred approach of restricting sign-up to a few selected watersheds would unnecessarily prevent most farmers from gaining access to the CSP. Please get rid of this.
3. USDA's proposed rules fail to make adequate payments for environmental benefits produced by farmers currently practicing effective conservation. CSP base payments should be set at the local rental rates based on land capability without the 90% reduction proposed by USDA. The enhanced payments should not be treated as cost-share. Treat them as real bonuses and reward exceptional performance. Recognize and reward conservation of our soil and other resources.
4. Both resource-conserving crop rotations and managed rotational grazing are specifically named for enhanced payments in the CSP statute. The final rule should highlight substantial enhancement payments for these systems as well as payments for management of existing practices. Recognize and reward those farmers who practice these important conservation tools.
5. Don't penalize farmers for shifting former cropland to pasture as part of a managed grazing system. Former or potential cropland that is pastured and put into a managed rotational grazing system must receive equal payment rates to other cropland and not the lower rate of pastureland. Establish base payments based on NRCS land capability classes, not current land use.
6. CSP should allow farmers with USDA-approved organic certification plans under the National Organic Program to simultaneously certify under both the National Organic Program and CSP, if they meet the standards of both.

In addition,

- Use the one-producer, one-contract approach to CSP Contracts and make all CSP payments applicable to only real persons, not corporate or business entities.
- Maintain the payment limits--namely \$20,000, \$35,000 and \$45,000 for Tiers 1, 2, and 3.
- Make the contracts renewable and leave it up to the farmer to decide whether to renew or not.

In short, please honor the intent of the law as passed by Congress when issuing a supplement to the rules and then again give us a period of time to comment.

Sincerely,
Donna Marie Wermus
Donna Marie Wermus

200 Nolden Lane
Jordan, MN 55352
February 24, 2004

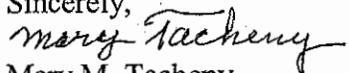
Conservation Security Program Comments
ATTN: David McKay
NRCS Conservation Operations Division
P.O. Box 2890
Washington, DC 20013

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7. Use one-producer, one-contract approach to CSP Contracts and all CSP payments should be made applicable to only real persons, not corporate or business entities.
8. The payment limits set in the law should be maintained—namely \$20,000, \$35,000 and \$45,000 for Tiers 1, 2, and 3 respectively.
9. Make the contracts renewable and leave it up to the farmer to decide whether to renew or not.

In short, please honor the intent of the law as passed by Congress when issuing a supplement to the rules and then again give us a period of time to comment.

Sincerely,

Mary M. Tacheny

2/25/04

David McKay
NRCS Conservation Operations Division
P.O. Box 2890
Washington, DC 20013

Dear David,

I am writing to you in regards to the controversy surrounding the Conservation Security Program.

From my understanding, there are those attempting to change the intent of the CSP by replacing restrictions or penalties on those farmers participating in the program that happen to live in certain geographical areas. I strongly disagree with those actions attempting to be made by a few, affecting many.

Also, it has come to my attention that there appears to be an attempt to undermine the CSP by not offering farmers the financial incentives that were originally and clearly defined. That is, a CSP which intends on providing fair enhanced pay incentives to farmers who willingly manage intensive rotational grazing systems as well as other programs.

I would expect a program which has been passed in the "Farm Bill" to be implemented in the manner in which it was intended, and that is a course of land stewardship farming opposed to land abuse farming.

Please consider the long term consequences of unjust actions and decision making.

Sincerely,



Tim Peterson

2/24/04

Mr McKay

Regarding the CSP Program. To conserve soil & water we must encourage more No-Til corn down an old former 82 and have been planting N.T. Corn 23⁺ yrs. Soybeans since No-Til drills has been available. It shouldn't be permitted to chisel soy B stubble in the fall after harvest.

Lee E. Oswald
600 E Chesrown Rd
MANSFIELD, OH 44903

INCENTIVES FOR
MORE NO-TIL



OHIO FARM BUREAU®

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March 1, 2004

Conservation Security Program Comments
ATTN: David McKay
NRCS Conservation Operations Division
P.O. Box 2890
Washington, DC 20013

As a vegetable and poultry farmer from Callaway County, Missouri, I am writing to suggest important changes to the USDA's proposed rules on the Conservation Security Program (CSP). CSP should be open to all farmers in the U.S. practicing effective conservation, just like it was passed in the 2002 farm bill.

I have two primary concerns with USDA's proposed rules:

1. CSP was supposed to be available nationwide to all farmers using good conservation practices on their land. The USDA needs to get rid of the idea of restricting CSP to a few "selected watersheds" and undefined "categories." This could leave out thousands of farmers who are looking to make their operations more environmentally sustainable.
2. The USDA's proposed rules cut the intended payments for environmental benefits being produced by farmers currently practicing effective conservation. The best way to secure the vital conservation of our soil and other resources is to recognize and reward it when and where it is being done. Paying the best practitioners for results is sound economics and smart policy, providing both reward and motivation. CSP base payments should be set at the local rental rates based on land capability without the 90% reduction proposed by USDA. Enhanced payments should reward the most environmentally-beneficial systems and to the maximum extent possible pay for results. The enhanced payments should not be treated as cost-share but rather as real bonuses to reward exceptional performance.

I hope that you will address these concerns and make CSP a fully-funded program open to all farmers in the country who are willing to implement good conservation practices.

Thank you,



Bryce Oates
6197 Winding Road
Fulton, MO 65251

February 24, 2004

Bruce I. Knight, Chief
Conservation Operations Division
Natural Resources Conservation Services
PO Box 2890
Washington, DC 20013-2890

Re: Conservation Security Program

Dear Chief Bruce I. Knight:

I am writing to urge you to please have the Conservation Security Program be a fully working program for all of our family farms out here in western Minnesota, and across the country. Congress made this law and approved plenty of money to make it work for our farms and our environment.

The new proposed rule that we have heard about is terrible. It would limit the conservation money to just a few farmers in a few isolated spots in our country. This is not what our farmers and other conservation minded Americans asked Congress to do, and not what Congress did.

This proposed rule also would have the money going just to a few farmers who are already doing good conservation practices. One of the best ideas about the CSP program was that it would get money to farmers who couldn't afford to do any good conservation practices yet on their farm fields. We have heard that it would also be unfair to farmers who had already changed their row crops to pastures, which is a better conservation use.

Our lakes and especially our creeks and rivers are polluted from agricultural runoff. We want this stopped, and the money going to our farmers would be tremendous for our small town communities out here in western Minnesota. **Please change the rules so that the CSP program does what it was intended to do.**

Sincerely,



Laura Ascherman
204 3rd St. N.
Danvers, MN 56231

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February 25, 2004

Conservation Security Program Comments
ATTN: David McKay
NRCS Conservation Operations Division
P.O. Box 2890
Washington, DC 20013

When the Conservation Security Program was passed in the 2002 farm bill, I was excited about having a source of support for bringing some more sustainable growing practices into my operation. Like most farmers, I want to make sure that my operation is good for the land, water and air. CSP could help me make sure I'm doing all that I can for the environment.

However, then I heard that USDA is proposing that CSP only be implemented in certain watersheds. This is a program that should be open to all farmers in the U.S.A. It shouldn't be open to a handful of lucky farmers who happen to live in a watershed selected by USDA.

Please read the farm bill and make sure that CSP is open to all farmers. That is the only way it can be a popular program that supports farmers and the environment at the same. Thank you for your time.

Andrew Read
4318 Glaser Hollow Road
Bland, MO 65014

February 27, 2004

Conservation Security Program Comments
ATTN: David McKay
NRCS Conservation Operations Division
P.O. Box 2890
Washington, DC 20013

I own and operate a grocery store that sells the foods produced by sustainable family farmers from all over Missouri. I also raise organic vegetables for the store on my farm in Callaway County, Missouri. Many of the farmers who provide food for our store are interested in utilizing the proposed Conservation Security Program—CSP. This program could provide a valuable investment for the environment by increasing the number of farmers who use sustainable practices on their farm.

I have several problems with USDA's proposed rules on CSP that I hope you will address:

- 1.) CSP should allow farmers with USDA-approved organic certification plans under the National Organic Program to simultaneously certify under both the National Organic Program and CSP, if they meet the standards of both. No need to tie farmers up in red tape.
- 2.) The USDA's proposed rules cuts the economic benefits being produced by farmers currently practicing effective conservation. The best way to secure the vital conservation of our soil and other resources is to recognize and reward it when and where it is being done. Paying the best practitioners for results is sound economics and smart policy, providing both reward and motivation. CSP base payments should be set at the local rental rates based on land capability **without the 90% reduction proposed by USDA.**
- 3.) USDA must adhere to the law, and to the recently appropriated full funding of CSP by Congress, and make CSP available nationwide to all farmers practicing effective conservation. USDA's "preferred approach" in the proposed rule would severely and unnecessarily prevent most farmers from gaining access to the CSP. The USDA needs to get rid of the idea of restricting sign-up for CSP to a few "selected watersheds" and undefined "categories."

Thank you for addressing these concerns. If CSP is implemented as it was intended, it will be a very popular program that benefits farmers, consumers and the environment alike.

Walker Claridge
The Root Cellar
21 North Providence
Columbia, MO 65203

February 28, 2004

**Conservation Security Program Comments
ATTN: David McKay
NRCS Conservation Operations Division
P.O. Box 2890
Washington, DC 20013**

The Conservation Security Program, if implemented correctly, could be an important source of funding for family farmers like me. This program could help us implement more environmentally friendly growing practices on our operations. Unfortunately, the proposed rules on CSP have changed the program for the worse.

First, USDA is proposing to fund CSP in certain watersheds only. CSP was supposed to be an entitlement for all farmers in the country willing to participate, not a handful of farmers in a select few geographic areas. USDA should make sure that CSP is open to all farmers who want to participate.

Second, USDA is proposing that CSP payments be cut by substantial amounts. In the farm bill version of CSP, farmers would have been rewarded significantly for their participation. The proposed rules cut those payments to as low as 10 cents per enrolled acre. That is not even worth the time it takes to fill out the paperwork. USDA should keep the same payment amounts as was agreed to in the 2002 farm bill.

Thank you for considering these concerns. Please implement CSP as it was passed in the farm bill, not as it is being proposed by USDA's revised rules.

**Ron Perry
15090 LIV 228
Chillicothe, MO 64601**